



# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF OIL, GAS AND MINING

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Michael O. Leavitt  
Governor  
Lowell P. Braxton  
Division Director

August 17, 1998

Glenn Wadsworth, Plant Manager  
Reilly Wendover  
P.O. Box 580  
Wendover, Utah 84083-0580

Re: Approval of Amendment to Implement Pond VI, Reilly Wendover's Bonneville Plant,  
M/045/002, Tooele County, Utah

Dear Mr. Wadsworth:

On January 8, 1998, the Division received your permit amendment and due to a backlog of other permit reviews, was unable to complete the review within our usual 30-day timeframe. We apologize for this delay and hope it has not inconvenienced your operation. We have now completed our review of your request to implement the new solar evaporation pond (Pond VI). The location of Pond V (pond being decommissioned) and Pond VI (new pond), is found on Drawing #970416-001 (rev 0, dated 12/11/97). This drawing was received with your permit amendment.

One of the principal issues of concern to the Division in our review of the permit amendment was if the originally approved reclamation requirements for Pond V would also be appropriate for reclamation of Pond VI. On February 6, 1998, we conducted an onsite inspection of the pond areas, the existing dikes and canals, and older eroded dikes, to assess their present condition. Our subsequent findings and conclusions on the permit amendment are outlined below:

The Division has determined that the dikes associated with Pond VI will not need to be breached and regraded at final reclamation. Several factors precipitated our decision as follows:

1. Leaving the dikes intact and allowing the impoundment dikes to erode naturally over time will retain salts within the existing impoundment area and will not readily contaminate the surrounding areas.
2. At some point in the future, the sodium chloride salts accumulated behind the dikes may be harvested or used to supplement the current Salt Laydown Project.
3. Existing dikes were observed to act as a wind break trapping native seed sources. When environmental conditions allow the seeds to germinate, they provide supplemental vegetation and limited wildlife habitat in this otherwise harsh environment.

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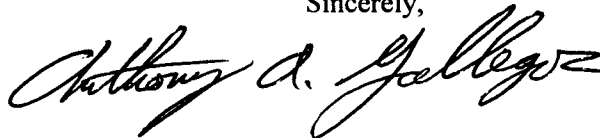
4. The dikes and *minor* distribution canals/trenches of Pond VI should erode and fill in naturally over time. We observed this erosion phenomena during our most recent inspection of the older distribution channels and ponding systems.
5. Pond VI will be located several miles south of the main interstate highway system. Consequently, its presence and profile should not present a visual impairment or aesthetic deterrent to the general public.
6. Leaving Pond VI and its *minor* ditches and canals unreclaimed upon termination of operations should not present a safety hazard to the general public because of its remoteness and location on private lands with limited access.

In summary, the Division hereby *approves* the amendment for the construction and use of Pond VI. The term *minor* as used above by the Division, is meant to describe ditches and canals which are less than ten (10) feet wide and less than four (4) feet deep.

*As a result of our review of this permit amendment and the observations made during our recent inspection of the mine area, the Division will be requesting additional information to update the approved mining and reclamation plan in a separate letter. The reclamation surety posted with the Division was due for review in July 1998, therefore, updating the reclamation surety will also be a part of the mining and reclamation plan update. We hope to have this separate letter sent to you within the next 30-45 days.*

Thank you for your help in finalizing this permitting action. If you have any questions or wish to schedule a meeting to discuss our approval of this amendment, or the requested permit modifications, please contact me at (801) 538-5286, or Tom Munson of my staff at (801) 538-5321.

Sincerely,



D. Wayne Hedberg  
Permit Supervisor  
Minerals Reclamation Program

jb  
cc: Alan Rabinoff, BLM, SLDO  
Will Stokes, SITLA  
Mary Ann Wright, DOGM  
Tom Munson, DOGM  
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